

TALG, NV, LTD.  
5852 S. Durango Dr., Suite 105  
Las Vegas, NV 89113  
Phone: (702) 954-3861 / Fax: (949) 266-8406

**TALG, NV, LTD.**

Ismail Amin (NV Bar No. 9343)  
Marian L. Massey (NV Bar No. 14579)  
5852 S. Durango Dr., Suite 105  
Las Vegas, NV 89113  
Telephone: (702) 954-3861  
Fascimile: (949) 266-8406  
[iamin@talglaw.com](mailto:iamin@talglaw.com)  
[mmassey@talglaw.com](mailto:mmassey@talglaw.com)  
*Pro Bono Attorneys for Plaintiff*  
*Reynaldo Crespín*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

REYNALDO CRESPIÑ, an individual,

Plaintiff,

v.

THE STATE OF NEVADA, NEVADA  
DEPARTMENT OF CORRECTIONS, H.D.S.P.  
MEDICAL DEPARTMENT, JAMES SCALLY,  
Associate Warden of High Desert State Prison,  
JAMIE CABRERA, Director of Nursing at High  
Desert State Prison, MR. ARAYSIO,  
Correctional Officer at High Desert State Prison,  
DR. MALANAGA, Physician at High Desert  
State Prison, DR. EVRAM, Physician at High  
Desert State Prison, DOES I to III, ROES I to III,

Defendants.

Case No.: 2:23-cv-01059-GMN

**STIPULATON FOR LEAVE TO FILE  
PLAINTIFF'S SECOND AMENDED  
COMPLAINT**

**(First Request)**

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Local Rules 7-1 and 15-1(a), Plaintiff REYNALDO CRESPIÑ (“Crespín” or “Plaintiff”) and Defendant JAMES SCALLY (“Scally”) (collectively referred to as the “Parties”), by and through their respective counsel of record, and hereby stipulate and agree to allow Plaintiff to amend his pleading and file a Second Amended Complaint.

On February 6, 2025, Plaintiff’s counsel emailed counsel for Mr. Scally to set a time to conduct a meet and confer in accordance with FRCP 15(a)(2) and Local Rule 15-1. The following day, on February 7, 2025, Plaintiff’s counsel provided defense counsel with a copy of the Second Amended

1 Complaint that Plaintiff sought leave from the Court to file in this matter. A copy the Second Amended  
2 Complaint and the exhibits referenced therein is attached as **Exhibit 1**.

3 On February 10, 2025, counsel for the Parties conferred regarding Plaintiff's request to file a  
4 Second Amended Complaint, which seeks leave to amend the allegations in the First Amended  
5 Complaint regarding the factual background involving the dispute as well as to assert additional causes  
6 of action against new parties. During the conference, counsel for Mr. Scally advised he was amenable  
7 to stipulating to allow Plaintiff leave to file the Second Amended Complaint.

8 In accordance with FRCP 15(a)(2) and Local Rule 15-1(a), the Parties stipulate and agree that  
9 Plaintiff may have leave to amend the allegations in the First Amended Complaint, and to file the  
10 Second Amended Complaint attached as **Exhibit 1**. If approved by the Court, Plaintiff shall promptly  
11 file the Second Amended Complaint in accordance with Local Rule 15-1(b).

12 This request is timely as it is being made before the deadline to amend pleadings as set forth in  
13 the Court's scheduling order, which is currently set as March 17, 2025. (ECF No. 43).

14 This request is made in good faith and not for purposes of delay.

15 This is the Parties' first request for leave to allow Plaintiff to file an amended pleading.

16 **IT IS SO STIPULATED.**

17 DATED this 10th day of February, 2025.

DATED this 11th day of February, 2025.

18 **TALG, NV, LTD.**

19 **STATE OF NEVADA**  
20 **OFFICE OF ATTORNEY GENERAL**

21 /s/ Marian Massey

/s/ Rudolf D'Silva

22 Ismail Amin, Esq. (NV Bar No. 9343)  
23 Marian L. Massey, Esq. (NV Bar No. 14579)  
24 5852 S. Durango Dr, Suite 105  
25 Las Vegas, NV 89113  
26 Tel.: (702) 954-3861  
27 Fax: (949) 266-8406  
28 [iamin@talglaw.com](mailto:iamin@talglaw.com)  
[mmassey@talglaw.com](mailto:mmassey@talglaw.com)

Rudolf M. D'Silva, Esq. (NV Bar No. 16227)  
555 E. Washington Ave., Ste. 3900  
Las Vegas, Nevada 89101  
Tel: (702) 486-3375  
Fax: (702) 486-3773  
[rdsilva@ag.nv.gov](mailto:rdsilva@ag.nv.gov)  
Attorneys for Defendant  
James Scally

*Pro Bono Attorneys for Plaintiff*  
*Reynaldo Crespin*

1 DATED this 10th day of February, 2025.

2 **TALG, NV, LTD.**

3 /s/ Marian Massey

4 Ismail Amin, Esq. (NV Bar No. 9343)  
5 Marian L. Massey, Esq. (NV Bar No. 14579)  
6 5852 S. Durango Dr, Suite 105  
7 Las Vegas, NV 89113  
8 Tel.: (702) 954-3861  
9 Fax: (949) 266-8406  
10 [iamin@talglaw.com](mailto:iamin@talglaw.com)  
11 [mmassey@talglaw.com](mailto:mmassey@talglaw.com)  
12 *Pro Bono Attorneys for Plaintiff*  
13 *Reynaldo Crespín*

14 **IT IS SO ORDERED.**

15 Dated this 24 day of February, 2025.

DATED this 11th day of February, 2025.

**STATE OF NEVADA**  
**OFFICE OF ATTORNEY GENERAL**

/s/ Rudolf D'Silva

Rudolf M. D'Silva, Esq. (NV Bar No. 16227)  
555 E. Washington Ave., Ste. 3900  
Las Vegas, Nevada 89101  
Tel: (702) 486-3375  
Fax: (702) 486-3773  
[rdsilva@ag.nv.gov](mailto:rdsilva@ag.nv.gov)  
*Attorneys for Defendant*  
*James Scally*

  
\_\_\_\_\_  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT